

May 3, 2013

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; and In the Matter of Framework for Next Generation 911 Deployment, PS Docket No. 10-255

Dear Ms. Dortch:

On May 2, 2013, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Matthew Gerst, Director, State Regulatory & External Affairs of CTIA – The Wireless Association® (“CTIA”), met via teleconference with David Furth, Tim May, Nicole McGinnis and Aaron Garza of the Public Safety & Homeland Security Bureau (“Bureau”) regarding matters relating to the text-to-911 requirements proposed in the above referenced proceedings. Also participating via teleconference were Joe Marx and Mike Tan of AT&T, Ray Rothermel and Allison Jones of Sprint, Bill Tortoriello of U.S. Cellular®, and Kevin Green and Robert Morse of Verizon (collectively “wireless participants”).

CTIA and the wireless participants discussed technical, operational and policy issues related to providing a bounce back message in the specific situation that a Public Safety Answering Point (“PSAP”) may need to notify subscribers that the PSAP is unable to accept or process text-to-911 messages for a specified period of time (“PSAP initiated bounce back message”). This situation would occur only if: 1) the wireless provider offers text-to-911 services to its subscribers, 2) the appropriate PSAP has requested and is accepting such text-to-911 messages sent from wireless subscribers, and 3) the PSAP, at that point in time, determines that the PSAP can no longer accept or process text-to-911 messages and requests that a wireless provider send a bounce back message to its subscribers.

As a threshold matter, CTIA and the wireless participants suggested that the responsibility and capability to initiate bounce back messages in situations other than service unavailability should rest with the individual PSAP. The Bureau suggested that PSAPs may likely utilize these bounce back messages as the equivalent of a “busy signal” for voice calls to 9-1-1 when the PSAP is otherwise unable to accept or process text-to-911 messages. CTIA and some wireless participants recommended that, rather than requiring each wireless provider to adopt a potentially unique mechanism for a PSAP to contact the wireless provider to institute a bounce back message in these

situations, the technical capability and operational decisions for an individual PSAP to enable and disable these bounce back messages be centralized at the PSAP.

CTIA and some wireless participants noted that it is not necessary for the Commission to consider a requirement for PSAP initiated bounce back messages at this time. The concept of providing PSAP initiated bounce back messages was not previously considered as part of the Carrier-NENA-APCO voluntary agreement¹ or the recently released ATIS-TIA Joint Standard for SMS to 9-1-1.² Even if the Commission does require a PSAP initiated bounce back messages, CTIA and the wireless participants noted that a standard method should be developed in order to avoid diverting critical PSAP resources when such bounce back messages are necessary. A standard method for incorporating PSAP initiated bounce back messages into existing or contemplated deployments of text-to-911 requires further consideration and development by the appropriate standards organizations.

Should the Commission proceed with a PSAP initiated bounce back message requirement in the interim, it should clarify that (1) the PSAP alone is responsible for initiating the bounce back message, (2) the service provider alone determines the processes for implementing the bounce back in these cases, including whether the PSAP implements it from its own premises, as well as reasonable service provider-determined safeguards that the PSAP must follow, and, (3) such processes may differ among individual service providers.

In a separate teleconference on May 2, 2013, Christopher Guttman-McCabe also spoke with Courtney Reinhard, Legal Advisor to Commissioner Ajit Pai to convey the same concerns.

Pursuant to Section 1.1206 of the Commission's rules,³ this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided electronically to the meeting attendees. Please let the undersigned know if you have any questions regarding this filing.

¹ Letter from Terry Hall, APCO International, Barbara Jaeger, NENA, Charles W. McKee, Sprint Nextel, Robert W. Quinn Jr., AT&T, Kathleen O'Brien Ham, T-Mobile USA, and Kathleen Grillo, Verizon, to Julius Genachowski, Chairman, Federal Communications Commission, and Commissioners McDowell, Clyburn, Rosenworcel, and Pai, PS Docket 11-153, PS Docket 10-255 (Dec. 6, 2012) ("Carrier-NENA-APCO Agreement").

² ATIS & TIA, Joint Press Release, *ATIS and TIA Develop Nationwide Text to 9-1-1 Solution* (Apr. 2, 2013), available at <http://atis.org/PRESS/pressreleases2013/040213.asp>.

³ 47 C.F.R. § 1.1206.

Sincerely,

/s/ Christopher Guttman-McCabe

Christopher Guttman-McCabe
Vice President, Regulatory Affairs
CTIA-The Wireless Association®

cc: David Furth
Aaron Garza
Tim May
Nicole McGinnis
Courtney Reinhard